

July 15, 2013
Ken Miller
SNAKE RIVER ALLIANCE
Box 1731
Boise, ID 83701
Ph: (208) 344-9161

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER) CASE NO. IPC-E-13-15
COMPANY'S 2013 INTEGRATED)
RESOURCE PLAN) PETITION TO INTERVENE OF
THE SNAKE RIVER ALLIANCE

The Snake River Alliance, pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 72 and 73 IDAPA 31.01.01.072 and -.073, petitions the Commission to grant its request for intervention in the above-referenced case, IPC-E-13-15. The name and address of this intervenor is:

Snake River Alliance
Box 1731
Boise, ID 83701
208 344-9161 (o)
208 841-6982 (c)

The Snake River Alliance is represented in this proceeding by Ken Miller. Correspondence in this docket can be sent to the above address or via e-mail to: kmiller@snakeriveralliance.org. To reduce costs and environmental impacts of exchanging information in this case, the Alliance requests that, pursuant to IPUC Rules, information other than that which might be deemed confidential or otherwise must be hand-delivered be provided electronically and/or via email to the above address.

The Snake River Alliance is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and safety issues. In 2007, the Alliance expanded the scope of its mission by becoming Idaho's first nonprofit clean energy advocacy organization. The Alliance's energy program includes advocacy for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho's

regulated electric utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies, including electric utility rate structures and designs that promote energy conservation. The Alliance pursues these programs on behalf of its members, many of whom are customers of Idaho Power. The Alliance attended all meetings of the Idaho Power 2013 Integrated Resource Plan Advisory Council (IRPAC) and participated as an IRPAC member or in other roles in the development of the four IRPs preceding this one.

The Alliance and those it represents have a direct interest in this case for several reasons. As the Commission is aware, the Alliance has raised a number of issues relating to Idaho Power's Coal Unit Environmental Investment Analysis for the Jim Bridger and North Valmy Coal-Fired Power Plants [coal study], which was filed with the Commission on Feb. 14 as part of the Company's 2011 IRP Update in IPC-E-11-11. That study, and the data on which it is based, will be central to the Commission's consideration of the 2013 IRP in this case.

The Alliance has also filed an application to intervene in IPC-E-13-16, Idaho Power's application for a certificate of public convenience and necessity [CPCN] that was filed simultaneously with this application. In that case, Idaho Power has asked the Commission to conduct a CPCN review of its proposed investments in the Jim Bridger Units 3 and 4 coal plants. This is important because, as the Commission is aware, the 2013 IRP is based in large part on the continued operation of Idaho Power's rate-based coal assets, which provide approximately 40 percent of the Company's supply-side energy portfolio, depending on hydrological conditions and other factors.

As the Alliance noted in its application to intervene in IPC-E-13-16, the CPCN case has much in common with this case, and with regard to Bridger Units 3 and 4 it also intersects with PacifiCorp's 2013 IRP [PAC-E-13-05], in which the Commission has granted the Alliance's application to intervene. The Alliance has communicated to the Commission its concerns about Idaho Power's 2011 IRP Update and how that Update, which has received little if any public scrutiny and critical portions of which are not available for public review, has been incorporated into the 2013 IRP.

While the coal plant investment issues and the role of these plants in Idaho Power's generation portfolio are important to the Alliance and its constituents, there are many other issues contained in the 2013 IRP in which the Alliance has an interest. These include but are not limited to: Idaho Power's policies relating to renewable energy resources, in particular solar resources, and how they are valued for purposes of comparative portfolio modeling for use in the IRP; the status of the Company's solar demonstration project; transmission issues; the role of demand response programs and energy efficiency programs in meeting future load growth; carbon adder methodologies and how an adder might impact dispatch decisions; the potential role of the Northwest Power Pool Energy Imbalance Market to reduce region-wide dispatch costs and address renewable energy variability concerns; the Company's ongoing challenges in addressing peak demands; and wind integration issues.

As in the companion CPCN case [IPC-E-13-16], the Alliance believes it and those it represents have direct interests in this case, that its participation as an intervenor will not complicate or extend this case, and that to the extent allowed by Commission rules it will participate in this case.

The Alliance therefore requests that the Commission grant its request to participate in this case as an intervening party and that it be allowed to participate in this case on behalf of its constituents.

Therefore and pursuant to Rules 72 and 73 of the Commission's Rules of Procedure, IDAPA 31.01.01.072 and 073, the Alliance requests that this petition to participate in Case No. IPC-E-13-15 be granted.

Respectfully submitted,

Ken Miller
Clean Energy Program Director
Snake River Alliance
Boise, ID

(208) 344-9161
kmiller@snakeriveralliance.org

Hand Delivered

Jean Jewell
Commission Secretary (Original and seven copies)
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702

By Electronic Mail

Lisa D. Nordstrom
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, ID 83707
E-mail: lnordstrom@idahopower.com

Jennifer Reinhardt-Tessmer
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, ID 83707
E-mail: jreinhardt@idahopower.com